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May 20, 2022

**VIA EMAIL**

**The Honorable Juan R. Sanchez, U.S.D.J.**  
Chief Judge, Eastern District of Pennsylvania  
601 Market Street, No. 17614  
Philadelphia, PA 19106

**Re: Ingram v. County of Camden, et al.**  
**District of New Jersey Docket No. 14-cv-5519**  
**Our File No. 14-0712**

Dear Chief Judge Sanchez:

This letter responds to a letter dated May 18, 2022 from Plaintiff's counsel seeking a conference call with the Court to address the status of the drafting of settlement documentation.

This matter was settled on May 6, 2022. Our office is preparing a proposed Settlement Agreement. That process is complex and ongoing. The proposed draft must be reviewed by all defense counsel, as well as multiple insurance representatives and principals.

As I trust the Court can appreciate, this process cannot be rushed or done in haphazard fashion. There are serious repercussions, for example, if Plaintiff's future medical needs are not properly accounted for under the Medicare Secondary Payer Act (42 U.S. Code § 1395y). We are troubled to have been informed by Plaintiff's counsel that this is somehow not the defense's concern. We are hopeful that counsel will provide us with further information necessary as to how Mr. Ingram's future medical expenses are going to be accounted for so that this can be part of the settlement documentation.

For all of these reasons, Plaintiff's counsel's insistence that a General Release be provided immediately is unreasonable.

As explained to Plaintiff's counsel, we are working diligently to complete our portion of the settlement documentation. Nothing is being unduly delayed as suggested in counsel's letter.

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Finally, Plaintiff's counsel references a 30-day rule in New Jersey for the payment of settlement sums from the date of settlement. No citation is provided for this "rule" nor are we aware of any such rule. Plaintiff's counsel has been requested to provide that authority but has not yet done so.

Respectfully submitted,

**BROWN & CONNERY, LLP**

/s/ William F. Cook

William F. Cook, Esquire

WFC/

cc: All Record Counsel (*via ECF*)